

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

Counts 1-5: 18 U.S.C. § 2113(a) - Bank or Credit Union
 Robbery
 Count 6: 18 U.S.C. § 922(g)(1) - Felon in Possession of a
 Firearm

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: See Attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CLERK SUSAN SOONG

NO. DIST. OF CA.

DISTRICT COURT

4:27

DEFENDANT - U.S.

YOLANDA BROWN, a/k/a "Yo Yo"

DISTRICT COURT NUMBER

CR 16 0441 SI

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.
 1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge5) On another conviction} Federal State6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

 This report amends AO 257 previously submittedName and Office of Person
 Furnishing Information on this form BRIAN J. STRETCH U.S. Attorney Other U.S. AgencyName of Assistant U.S.
 Attorney (if assigned) SCOTT D. JOINER

PROCESS:

 SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

 Arraignment Initial Appearance

Defendant Address:

Date/Time: _____

Before Judge: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Comments: _____

PENALTY SHEET ATTACHMENT

COUNT ONE 18 U.S.C. § 2113(a) – Robbery of Wells Fargo (01/11/2016)

Maximum Prison Term of 20 years.
Maximum Fine of \$250,000.
Maximum Term of Supervised Release of 3 years.
Mandatory Special Assessment of \$100

COUNT TWO 18 U.S.C. § 2113(a) – Robbery of Patelco Credit Union (01/13/2016)

Maximum Prison Term of 20 years.
Maximum Fine of \$250,000.
Maximum Term of Supervised Release of 3 years.
Mandatory Special Assessment of \$100

COUNT THREE 18 U.S.C. § 2113(a) – Robbery of Patelco Credit Union (02/19/2016)

Maximum Prison Term of 20 years.
Maximum Fine of \$250,000.
Maximum Term of Supervised Release of 3 years.
Mandatory Special Assessment of \$100

COUNT FOUR 18 U.S.C. § 2113(a) – Robbery of Citibank (06/09/2016)

Maximum Prison Term of 20 years.
Maximum Fine of \$250,000.
Maximum Term of Supervised Release of 3 years.
Mandatory Special Assessment of \$100

COUNT FIVE 18 U.S.C. § 2113(a) – Robbery of Wells Fargo (06/16/2016)

Maximum Prison Term of 20 years.
Maximum Fine of \$250,000.
Maximum Term of Supervised Release of 3 years.
Mandatory Special Assessment of \$100

COUNT SIX 18 U.S.C. § 922(g)(1) – Felon in Possession (07/29/2016)

Maximum Prison Term of Ten Years;
Maximum Fine of \$250,000
Maximum Term of Supervised Release of Three Years;
Mandatory Special Assessment of \$100

FILED
2016 OCT 20 PM 4:25

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NO. DIST. OF CA.

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

SI

v.

CR16 0441

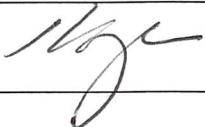
YOLANDA BROWN
a/k/a "Yo Yo"

DEFENDANT(S).

INDICTMENT

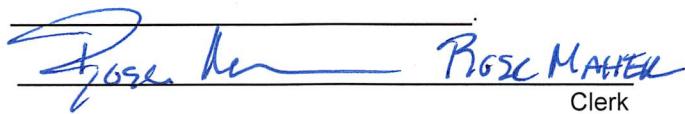
VIOLATIONS: 18 U.S.C. § 2113(a) – Bank and Credit Union
Robbery (Counts One through Five); 18 U.S.C. § 922(g)(1) – Felon in Possession
of a Firearm (Count Six); 18 U.S.C. § 924(d)(1) – Forfeiture of Firearm and Ammunition

A true bill.

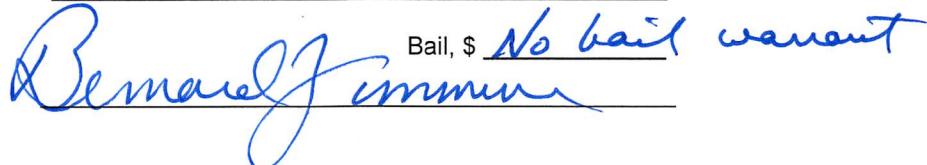


Foreman

Filed in open court this 20 day of OCT, 2016

 Rose Maher

Clerk

 Bernadette J. Immink

Bail, \$ No bail warrant

FILED
2016 OCT 20 PM 4:25
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NO. DIST. OF CA.

1 BRIAN J. STRETCH (CABN 163973)
2 United States Attorney
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

SI

10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,

CR 16 No. 0441

12 Plaintiff,

) VIOLATIONS: 18 U.S.C. § 2113(a) – Bank and
13 v. Credit Union Robbery (Counts One through Five); 18
14 YOLANDA BROWN, U.S.C. § 922(g)(1) – Felon in Possession of a Firearm
a/k/a “Yo Yo,” (Count Six); 18 U.S.C. § 924(d)(1) – Forfeiture of
15 Defendant. Firearm and Ammunition

) SAN FRANCISCO VENUE

17
18 INDICTMENT

19 The Grand Jury charges:

20 COUNT ONE: (18 U.S.C. § 2113(a) – Bank Robbery)

21 1. On or about January 11, 2016, in the Northern District of California, the defendant,

22 YOLANDA BROWN,
23 a/k/a “Yo Yo,”

24 knowingly took by intimidation from the persons and presence of employees of Wells Fargo Bank,
25 located at 2055 Chestnut Street, San Francisco, California, money belonging to and in the care, custody,
26 control, management, and possession of Wells Fargo Bank, the deposits of which were then insured by
27 the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section
28 2113(a).

INDICTMENT

1 COUNT TWO: (18 U.S.C. § 2113(a) – Credit Union Robbery)

2 2. On or about January 13, 2016, in the Northern District of California, the defendant,

3 YOLANDA BROWN,
4 a/k/a “Yo Yo,”

5 knowingly took by intimidation from the persons and presence of employees of Patelco Credit Union,
6 located at 1358 Fairmont Drive, San Leandro, California, money belonging to and in the care, custody,
7 control, management, and possession of Patelco Credit Union, the accounts of which were then insured
8 by the National Credit Union Administration (NCUA), in violation of Title 18, United States Code,
9 Section 2113(a).

10 COUNT THREE: (18 U.S.C. § 2113(a) – Credit Union Robbery)

11 3. On or about February 19, 2016, in the Northern District of California, the defendant,

12 YOLANDA BROWN,
13 a/k/a “Yo Yo,”

14 knowingly took by intimidation from the persons and presence of employees of Patelco Credit Union,
15 located at 1358 Fairmont Drive, San Leandro, California, money belonging to and in the care, custody,
16 control, management, and possession of Patelco Credit Union, the accounts of which were then insured
17 by the National Credit Union Administration (NCUA), in violation of Title 18, United States Code,
18 Section 2113(a).

19 COUNT FOUR: (18 U.S.C. § 2113(a) – Bank Robbery)

20 4. On or about June 9, 2016, in the Northern District of California, the defendant,

21 YOLANDA BROWN,
22 a/k/a “Yo Yo,”

23 knowingly took by intimidation from the persons and presence of employees of Citibank, located at 2400
24 19th Avenue, San Francisco, California, money belonging to and in the care, custody, control,
25 management, and possession of Citibank, the deposits of which were then insured by the Federal
26 Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section 2113(a).

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INDICTMENT

1 COUNT FIVE: (18 U.S.C. § 2113(a) – Bank Robbery)

2 5. On or about June 16, 2016, in the Northern District of California, the defendant,

3 YOLANDA BROWN,
4 a/k/a “Yo Yo,”

5 knowingly took by intimidation from the persons and presence of employees of Wells Fargo Bank,
6 located at 3365 Deer Valley Road, Antioch, California, money belonging to and in the care, custody,
7 control, management, and possession of Wells Fargo Bank, the deposits of which were then insured by
8 the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section
9 2113(a).

10 COUNT SIX: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm and Ammunition)

11 6. On or about July 27, 2016, in the Northern District of California, the defendant,

12 YOLANDA BROWN,
13 a/k/a “Yo Yo,”

14 having been previously convicted of a crime punishable by a term of imprisonment exceeding one year,
15 unlawfully and knowingly possessed a firearm, specifically: one Taurus PT 945, .45 caliber ACP semi-
16 automatic pistol, with the serial number obliterated except for the number 7, in and affecting interstate
17 and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

18 FORFEITURE ALLEGATIONS: (18 U.S.C. § 924(d)(1))

19 The allegations contained in Count Six of this Indictment are realleged and by this reference
20 fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C.
21 § 924(d)(1).

22 Upon a conviction for the offense alleged in Count Six above, defendant,

23 YOLANDA BROWN,
24 a/k/a “Yo Yo,”

25 shall forfeit to the United States any firearm or ammunition involved in or used in any knowing
26 violation of said offense, including but not limited to the following property: one Taurus PT 945, .45
27 caliber ACP semi-automatic pistol, with the serial number obliterated except for the number 7; all in
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INDICTMENT

1 violation of Title 18, United States Code, Section 924(d)(1).

2 DATED: 10/20/16

3 A TRUE BILL.

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6 FOREPERSON

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BRIAN J. STRETCH
United States Attorney

STEPHEN J. MEYER
Chief, Organized Crime Strike Force

(Approved as to form: SJ)

AUSA SCOTT D. JOINER